

**INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS REGARDING MAY 1, 2019 HEARING**

1 The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747).

To the Honorable United States Magistrate Judge Judith Gail Dein:

The Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”), hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for May 1, 2019 Hearing* [Case No. 17-3283, Docket No. 6474; Case No. 17-3566, Docket No. 467] (the “Scheduling Order”) and respectfully states as follows:

1. Nicholas A. Bassett of Paul Hastings LLP will appear in person on behalf of the Committee at the Hearing (as defined in the Scheduling Order), Courtroom 8 at the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts, and address, as necessary, the following matters:

- (a) *Motion of Andalusian Global Designated Activity Company, Mason Capital Master Fund, LP, and the Puerto Rico Funds for a Protective Order* [Case No. 17-3283, Docket No. 6234; Case No. 17-3566, Docket No. 440];
- (b) *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Compel Production of Documents in Privilege Log Categories 1 to 4 [Attorney-Client Privilege, Attorney Work Product, Common Interest]* [Case No. 17-3283, Docket No. 6253; Case No. 17-3566, Docket No. 443];
- (c) *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Compel Production of Documents in Privilege Log Categories 1, 5 to 7 [Deliberative Process Privilege and Executive Privilege]* [Case No. 17-3283, Docket No. 6320; Case No. 17-3566, Docket No. 446];

- (d) Any objections, responses, statements, joinders, or replies to any of the foregoing pleadings; and
- (e) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing in San Juan, Puerto Rico.

WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: April 25, 2019

/s/ Luc A. Despins

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- and -

/s/ Juan J. Casillas Ayala

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